

PEARSON, SIMON & WARSHAW, LLP
15165 VENTURA BOULEVARD, SUITE 400
SHERMAN OAKS, CALIFORNIA 91403

STEPHEN M. TILLERY (*pro hac vice*)
stillery@koreintillery.com
GARRETT R. BROSHUIS (Bar No. 329924) (*pro hac vice*)
gbroshuis@koreintillery.com
MARC WALLENSTEIN (*pro hac vice*)
mwallenstein@koreintillery.com
DIANE MOORE (Bar No. 214903)
dmoore@koreintillery.com
KOREIN TILLERY, LLC
505 North 7th Street, Suite 3600
St. Louis, MO 63101
Telephone: (314) 241-4844
Facsimile: (314) 241-3525

CLIFFORD H. PEARSON (Bar No. 108523)
cpearson@pswlaw.com
DANIEL L. WARSHAW (Bar No. 185365)
dwarshaw@pswlaw.com
BOBBY POUYA (Bar No. 245527)
bpouya@pswlaw.com
PEARSON, SIMON & WARSHAW, LLP
15165 Ventura Boulevard, Suite 400
Sherman Oaks, CA 91403
Telephone: (818) 788-8300
Facsimile: (818) 788-8104

JILL M. MANNING (Bar No. 178849)
jmanning@pswlaw.com
BENJAMIN E. SHIFTAN (Bar No. 265767)
bshiftan@pswlaw.com
PEARSON, SIMON & WARSHAW, LLP
350 Sansome Street, Suite 680
San Francisco, CA 94104
Telephone: (415) 433-9000
Facsimile: (415) 433-900

Plaintiffs' Co-Lead Class Counsel

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

AARON SENNE, et al., Individually and on
Behalf of All Those Similarly Situated,

Plaintiffs,

vs.

OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
BASEBALL; et al.;

Defendants.

Case No. 3:14-cv-00608-JCS
(consolidated with No. 3:14-cv-03289-JCS)
Assigned to: Hon. Joseph C. Spero

CLASS ACTION

STIPULATION AND ~~[PROPOSED]~~ ORDER EXTENDING DEADLINE FOR FILING MOTION FOR PRELIMINARY APPROVAL

1 WHEREAS the parties previously reached a settlement of the case in principle, *see* ECF
2 No. 1122;

3 WHEREAS the Court previously set a deadline of July 11, 2022 for Plaintiffs to file their
4 motion for preliminary approval, ECF No. 1123;

5 WHEREAS the parties have agreed to a confidential memorandum of understanding,
6 which remains confidential, regarding the proposed settlement;

7 WHEREAS the Court set a case management conference for August 19, 2022 at 2:00 p.m.,
8 ECF No. 1123;

9 WHEREAS the parties have worked diligently towards finalizing the proposed settlement
10 documents and preparing the motion for preliminary approval and supporting papers, but a short
11 four-day extension is needed to finalize and execute these documents;

12 WHEREAS an extension of time for filing the motion for preliminary approval from July
13 11, 2022 to July 15, 2022 would still provide 35 days between the filing of the motion and the
14 August 19 case management conference in accordance with local rules;

15 WHEREAS the signature of Defendants' counsel, Elise M. Bloom, shall be sufficient to
16 bind all of the Defendants to the terms of this stipulation and any court order resulting from it.

17 THE PARTIES STIPULATE AS FOLLOWS:

18 The deadline for Plaintiffs to file their motion for preliminary approval shall be continued
19 until July 15, 2022.

20
21 DATED: July 7, 2022

Respectfully submitted,

22
23 /s/ Garrett R. Broshuis

24 PEARSON, SIMON & WARSHAW LLP
25 Clifford H. Pearson
26 Daniel L. Warshaw
27 Bobby Pouya
28 Benjamin E. Shiftan

PEARSON, SIMON & WARSHAW, LLP
15165 VENTURA BOULEVARD, SUITE 400
SHERMAN OAKS, CALIFORNIA 91403

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

KOREIN TILLERY, LLC
Stephen M. Tillery
Garrett R. Broshuis
Marc Wallenstein
Diane Moore

Plaintiffs Co-Lead Class Counsel

DATED: July 7, 2022

/s/ Elise M. Bloom

PROSKAUER ROSE LLP
Elise M. Bloom
Neil H. Abramson
Adam M. Lupion
Mark W. Batten
Rachel Philion
Noa M. Baddish
Joshua S. Fox
Philippe A. Lebel
Samantha R. Manelin

Attorneys for Defendants

FILER'S ATTESTATION

I, Garrett Broshuis, am the ECF user whose identification and password are being used to file this Stipulation and [Proposed] Order Extending the Deadline for Filing Motion for Preliminary Approval. I hereby attest that the counsel listed above concur in this filing. I will maintain an executed copy of this pleading in our files that can be made available for inspection upon request.

Dated: July 7, 2022

/s/ Garrett R. Broshuis
Garrett R. Broshuis

PEARSON, SIMON & WARSHAW, LLP
15165 VENTURA BOULEVARD, SUITE 400
SHERMAN OAKS, CALIFORNIA 91403

[PROPOSED] ORDER

The Court, having considered the parties' stipulation, and cause appearing, IT IS HEREBY ORDERED that:

The deadline for Plaintiffs to file their motion for preliminary approval shall be continued until July 15, 2022.

DATED: July 7, 2022



HONORABLE JOSEPH C. SPERO
Chief Magistrate Judge